

CLERKS OFFICE U.S. DIST. COURT
AT LYNCHBURG, VA
FILED
5/25/2022

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

JULIA C. DUDLEY, CLERK
BY: s/ CARMEN AMOS
DEPUTY CLERK

UNITED STATES OF AMERICA

v.

CHENMEI WANG

Case No.: 6:22CR00012-001

AGREED STATEMENT OF FACTS

This Statement of Facts briefly summarizes the facts and circumstances surrounding the criminal conduct at issue in this case. It does not contain all of the information obtained during the investigation and applicable to an accurate Presentence Investigation Report and Sentencing Guidelines Calculation. The Statement of Facts is not protected by proffer agreement or any other agreement, and shall be wholly admissible at trial notwithstanding any rules or statutes to the contrary, including but not limited to, Federal Rules of Evidence 408, 410 and Federal Rule of Criminal Procedure 11.

Beginning in and around June 2019 and continuing through July 2021, CHENMEI WANG, aided and abetted by individuals both known and unknown, conspired and agreed to transport, transmit, and transfer stolen gift cards in interstate or foreign commerce. WANG would be provided by another co-conspirator or co-conspirators known to WANG as "the Boss" with the number and PIN of one or more Walmart gift cards via a message on her cellular device. Typically, these gift cards would be in large amounts such as \$500. These gift cards had been stolen, converted or taken by fraud. Although WANG did not know the manner in which the gift card was stolen, converted, or taken by fraud, she was aware that the gift cards had been obtained illegally. While these gift cards were obtained from victims across the United States, at least two of the gift cards obtained by Wang were stolen, converted or taken by fraud from victims in the Western District of Virginia.

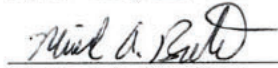
After receiving the number and PIN of the stolen gift card, WANG, either individually or aided and abetted by others, would enter a Walmart store and purchase multiple gift cards in small denominations, such as \$20, for other retailers, such as iTunes, Google Play, and Steam. WANG would pay for the gift cards using the number and PIN of the stolen Walmart gift cards provided to her by the Boss. After purchasing the new gift cards, Wang would transmit to the Boss via her cellular phone the number and PIN of the new gift cards. During the course of the conspiracy, WANG transmitted at least of \$415,308.46 worth of stolen gift cards in this manner.

To avoid detection, WANG purchased gift cards at different Walmart stores across the United States including, but not limited to, Texas, Alabama, Mississippi, Kansas, Florida, Ohio, Utah, and Virginia. From approximately November 2020 through July 2021, Wang was aided and abetted at times by [REDACTED] C [REDACTED] W [REDACTED] WANG advised [REDACTED] that they were engaged in illegal activity before [REDACTED] joined the conspiracy.

As part of the conspiracy, Wang committed the following overt act. On or about June 17, 2021, WANG and C [REDACTED] W [REDACTED] aided and abetted by each other, purchased approximately \$2,000 worth of gift cards in El Dorado, Kansas using Walmart gift cards stolen, converted or taken by fraud from victim C.S. in Altavista, Virginia which is located in the Western District of Virginia.

Seen and Agreed:

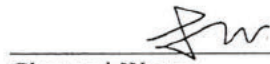
Date: May 25, 2022



Michael A. Baudinet
Assistant United States Attorney

I have reviewed the above Agreed Statement of Facts with my attorney and I agree that it is true and accurate.

Date: May 24, 2022



Chenmei Wang



Malcolm Doubles, Esq.
Attorney for Defendant